

Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 7/26/2017 3:37:50 PM
To: 'Salisbury, Dwayne N.' [DSalisbury@cabq.gov]
CC: Verhalen, Frances [verhalen.frances@epa.gov]; Curran, Trisha [Curran.Trisha@epa.gov]
Subject: RE: Exceptional Events (EE) 2016 - PM10, City 1/23/17 letter, South Valley and Jefferson sites

Dwayne, Sorry the results of OAQPS review of the matter are unfavorable. OAQPS views the 40 CFR 50 App K sec 3.1.f section language as not applying to your situation. The author intended the "first observed exceedance" to mean the first exceedance ever at the monitor. The section was intended for monitor sampling on a 1:6 schedule where the first exceedance cause an impact to the estimated exceedances such that the agency would then initiate daily sampling. OAQPS plans to publicly release the 2014-2016 PM10 DV of 1.1 for the South Valley monitor along with the national package sometime this week, possibly tomorrow. OAQPS can change the DV in the future if the situation changes (e.g., exceedances become excluded).

The three 2016 exceedances at the South Valley monitor now have regulatory significance for the purposes of the 2016 EE Rule. We need to work together on a potential due date for a EE Demonstration package for the exceedances, if you are still interested in pursuing it. I understand from our conversation last week, that any such Demonstration package would likely reflect relevant exceedances at the Jefferson monitor, since the city of Albuquerque believes the elevated measurements at the monitors are related.

Would you all be available to talk next Monday 7/31. I will send you a scheduler for 2 pm CST/1 pm MST but myself and Fran should be available any time on Monday between 1 pm and 3:30 pm CST, so reply with alternate time that might work for you. Thanks

Dorothy Crawford
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From: Crawford, Dorothy
Sent: Monday, July 17, 2017 2:34 PM
To: 'Salisbury, Dwayne N.'
Cc: Verhalen, Frances ; Curran, Trisha
Subject: RE: Exceptional Events (EE) 2016 - PM10, City 1/23/17 letter, South Valley and Jefferson sites

FYI. I have an email into the EPA national program, OQAPS, on whether the 2016 2nd quarter exceedance is eligible for an exception (40 CFR 50 App K sec 3.1.f) from the 'missing data' calculation. I need OAQPS input on the interpretation of the exception. If eligible and the 'missing data' calculation is not applied to 2016 2nd quarter, then the 2014-2016 PM10 DV for this monitor may indicate conformance to the NAAQS.

Unfortunately, I will not get input from the relevant OAQPS staff until next week. I am happy to keep the call scheduled on Thurs to talk about this or other matters but wanted to make you aware I may not have solid answer by Thurs 7/20 afternoon.

OAPQS indicates they plan to delay the national program release of PM10 DVs for at least a week pending resolution of this matter.

If you want to move our discussion or pre-schedule a follow-up call to next week, I could make a call, and Fran might be able to make a call on:

Tues 7/25 3 pm Dallas/2 pm Albuquerque
Wed 7/26 11 am Dallas/10 am Albuquerque

Wed 7/26 3 pm Dallas/2 pm Albuquerque

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From: Crawford, Dorothy
Sent: Monday, July 17, 2017 9:28 AM
To: 'Salisbury, Dwayne N.' <DSalisbury@cabq.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Curran, Trisha <Curran.Trisha@epa.gov>
Subject: RE: Exceptional Events (EE) 2016 - PM₁₀, City 1/23/17 letter, South Valley and Jefferson sites

Dwayne, I am sorry but my review of regulatory significance in the email below is incorrect for the South Valley 35-001-0029 monitor. Even after excluding the 2014 exceedance for this monitor in AQS, the 2014-2016 PM₁₀ Design Value for the South Valley monitor does not conform to NAAQS. See below in background section for more detail on the calculations. The 2016 PM₁₀ exceedances at this monitor do have potential regulatory significance. I will need to coordinate with R6 management on a formal response to the city of Albuquerque's 1/23/17 letter regarding a potential Exceptional Event Demonstration for the South Valley 2016 PM₁₀ exceedances.

Are you available for a conference call this week to discuss the potential Demonstration for these exceedances? In our formal response, we may need to provide a due date for the Demonstration and would like to have a better understanding of the projected scope of the work to prepare the Demonstration. Would you be available to talk on:

Thurs 7/20 at 11 am Dallas/10 am Albuquerque time,
Thurs 7/20 at 1:30 am Dallas/12:30 am Albuquerque,
Friday 7/21 at 11 am Dallas/10 am Albuquerque,
Friday 7/21 at 10 am Dallas/9 am Albuquerque, or
Friday 7/21 at 9 am Dallas/8 am Albuquerque?

Background: I thought the DV would be below PM₁₀ NAAQS when the 2014 exceedance was excluded and the total number of measured exceedances in the 3 year period was less than 4. I failed to recognize the 40 CFR 58 App K formula for PM₁₀ NAAQS interpretation makes adjustments for missed daily sampling. The subject monitor is continuous, i.e., provides daily measurements. In 2016, the monitor had an overall Data Completeness of 92%. There were, however, 29 days in 2016 with <18 hours of data which in turn caused the 3 measured exceedances in 2016 to be calculated using the 40 CFR 58 App K formula as 3.2 estimated exceedances for NAAQS comparison purposes. 2016 PM₁₀ Estimated Exceedances from this monitor currently calculate out as 3.2.

Quarter	Days in Quarter (N _q)	Days <18 Hours of Data	Days in Quarter with Data (n _q)	Days in Quarter/Days in Quarter with Data	Observed Exceedances in Quarter (v _q)	Estimated Exceedances in Quarter (e _q)
1	91	5	86	1.06	2	2.116
2	91	7	84	1.08	1	1.083
3	92	4	88	1.05	0	0
4	92	13	79	1.16	0	0
Total	366	29			3	3.200

Even with the 2014 exceedance exclusion, the 2016 PM₁₀ Estimated Exceedances of 3.2 in combination with zero in 2015 and 2014 results in 2014-2016 PM₁₀ DV of 1.1 for the monitor which does not conform to NAAQS.

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From: Crawford, Dorothy
Sent: Thursday, June 22, 2017 12:29 PM
To: Salisbury, Dwayne N. <DSalisbury@cabq.gov>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; Curran, Trisha <Curran.Trisha@epa.gov>
Subject: Exceptional Events (EE) 2016 - PM10, City 1/23/17 letter, South Valley and Jefferson sites

Dwayne, As strange as this sounds, the air monitoring group here at EPA Region 6 just got the city of Albuquerque's 1/23/17 letter. The delay is on our part, because the letter was stamped received by the region on 2/6/17. I apologize if this late review and response to the letter causes the city of Albuquerque any inconvenience. The 1/23/17 letter states the city plans to provide Demonstrations for the listed exceedances by 9/30/17.

Input: While recognizing 2017 and 2018 measurements from the subject monitors may change the regulatory significance of the exceedances listed in the 1/23/17 letter, we recommend city of Albuquerque not submit Exceptional Event Demonstrations for the three 2016 exceedances at 35-001-0029-81102-3 and the two 2016 exceedances at 35-001-0026-81102-1. Please keep us informed about any future exceedances at these monitors. Background on this recommendation is below.

Background: For PM10 NAAQS comparison purposes, a monitor with 4 non-excluded exceedances of the 150 µg/m³ level in 3 years would be viewed as not meeting the national standard of 'not to be exceeded more than once per year on average over 3 years'.

South Valley PM10 POC 3 - Once we resolve our AQS technical difficulties with the 5/7/14 exceedance at S Valley, there will only be three 2016 exceedances for the 3 year 2014-2016 period. If this monitor has any exceedances in 2017 or 2018, we will need to review the regulatory significance of the three 2016 exceedances. The first quarter of 2017 is not yet in AQS but if you know of an exceedance which has already occurred at S Valley this year, let us know. At this time, assuming no exceedances yet in 2017 and assuming we work thru the AQS glitch for 5/7/14 EE concurrence, the three 2016 exceedances at 35-001-0029-81102-3 do not appear to have sufficient regulatory significance to warrant the submittal of Exceptional Event Demonstrations.

Jefferson PM10 POC 1 – If this monitor has sufficient exceedances in 2017 or 2018, we will need to review the regulatory significance of the two 2016 exceedances. At this time, however, the two 2016 exceedances at 35-001-0026-81102-1 do not appear to have sufficient regulatory significance to warrant the submittal of Exceptional Event Demonstrations.

		Non-Excluded Actual Exceedances, from AQS			2014-2016 DV, AQS Calculation
		2014	2015	2016	
S Valley	35-001-0029-81102-3	1 (5/7/14)	0	3 (3/22/16, 3/29/16, 5/6/16)	1.4
Jefferson	35-001-0026-81102-1	0	0	2 (3/22/16, 5/6/16)	0.7

Notes:

For AQS PM10 NAAQS Design Value (DV), 'actual exceedances' are used to calculate 'estimated exceedances', and the calculated estimated exceedances are compared to the standard (≤1/year averaged over 3 years).

The '2014-2016 DV' data in the table above is from a 5/25/17 AQS data pull, with incomplete 2016 Data Certification and without EPA 5/5/17 EE concurrence letter being reflected in AQS. On 5/5/17, EPA agreed to concur with the city of Albuquerque Exceptional Event exclusion of PM10 exceedance that occurred at S Valley 35-001-0029-81102-3 on 5/7/14. Technical difficulties have, to date, prevented EPA from actually entering the concurrence flag into AQS for the 5/7/14 exceedance. Once EPA enters the 5/7/14 concurrence flag, the number of Non-Excluded Actual Exceedances at S Valley for 2014 will drop to zero.

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